

THE CITY OF NEW YORK
LAW DEPARTMENT

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January 23, 2008

SO ORDERED

The conference is rescheduled to
February 19, 2008 at 9:30 a.m.

George B. Daniels
HON. GEORGE B. DANIELS

VIA FAX

Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Andre Mullin, et al., v. City of New York, et al. 07 CV 4760 (GBD)

JAN 24 2008

Dear Judge Daniels:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and newly assigned attorney for defendants The City of New York, New York City Police Department and Police Officer Iscovi. This matter was previously handled by Assistant Corporation Counsel Jennifer Rubin, who is no longer with this office. I recently entered a notice of appearance in this matter and attempted to contact counsel to discuss this matter. I was contacted this morning by your chambers and was informed that a status conference is scheduled for 9:30 tomorrow in this matter. A review of the docket sheet did not reflect such. The undersigned informed Your Honor's law clerk that I have been unable to reach counsel and I was informed that the law clerk had similar difficulty when she attempted to contact counsel as well.

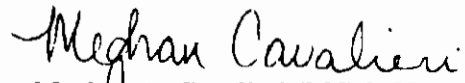
I therefore respectfully request: (1) an adjournment of the status conference scheduled for tomorrow at 9:30 a.m.; (2) a sixty (60) day extension of time from February 21, 2008 to April 21, 2008, within which this office may confer with counsel, further investigate the matter and complete discovery. The reason for this request is that I was just reassigned this case and I will need time to familiarize myself with the file, address outstanding discovery issues and proceed with the litigation.

The complaint alleges, inter alia, that plaintiffs Andre Mullin and Gabriel Quiros were falsely arrested, imprisoned, was subjected to excessive force. In addition to the City of New York and New York City Police Department, plaintiffs also name Police Officer John Iscovi as a defendant. It is my understanding that issue has been joined, and that discovery has commenced.

In view of the foregoing, it is respectfully requested that the Court grant the within requests, (1) granting an adjournment of the status conference scheduled for tomorrow, January 24, 2008 at 9:30 a.m., to a later date after counsel have conferred, and (2) granting defendants a sixty (60) day enlargement of time from February 21, 2008 to April 21, 2008 to complete discovery.

Thank you for your consideration in this regard.

Respectfully submitted,


Meghan A. Cavalieri (MC 6758)
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